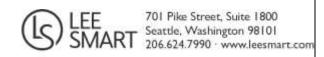
1 2 3 4 Hon. Thomas S. Zilly 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 ESTHER HOFFMAN; et al., 9 No. 2:18 cv 1132-TSZ Plaintiffs. 10 DEFENDANTS PATENAUDE & FELIX, A.P.C. AND MATTHEW CHEUNG'S VS. 11 JOINDER IN TSI'S MOTION FOR TRANSWORLD SYSTEMS SUMMARY JUDGMENT 12 INCORPORATED; et al., NOTED FOR HEARING: 13 Defendants. JULY 23, 2021 14 Patenaude & Felix, APC and Matthew Cheung (collectively "Patenaude") join TSI's 15 motion for summary judgment, without waiving their right to file their own dispositive motion 16 at some point in the future, if necessary. 17 Essentially all Plaintiffs' claims against Patenaude in their Second Amended Complaint, 18 (Dkt 61), arise from Patenaude filing the affidavits of TSI employees in support of motions in 19 underlying state litigation. Plaintiffs' describe these affidavits as "false" and "deceptive." See 20 (Dkt 61 at the Introduction, and \P 48-57, 73-81, 167, 169, 184(a), (c)). 21 In its motion, TSI dispels the idea that the declarations are false or deceptive. 22 Patenaude did not violate the CPA by filing true and correct affidavits. Therefore, claims 23 against Patenaude should be dismissed with prejudice. 24 25 DEFENDANTS' JOINDER IN TSI'S MOTION FOR



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1 DATED this 11th day of June, 2021. 2 LEE SMART, P.S., INC. 3 By: /s Marc Rosenberg Marc Rosenberg, WSBA No. 31034 4 Of Attorneys for Defendants Patenaude & Felix, APC, and 5 Matthew Cheung 6 1800 One Convention Place 7 701 Pike St. Seattle, WA 98101-3929 (206) 624-7990 8 mr@leesmart.com 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24



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1 CERTIFICATE OF SERVICE 2 I hereby certify that on the date provided at the signature below, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following individuals: 4 Sam Leonard sam@seattledebtdefense.com chenry@hdm-legal.com Christina L. Henry 5 gbeckett@beckettlaw.com Guy W. Beckett Amanda Martin amanda@nwclc.org 6 James K. Schultz ischultz@sessions.legal **Justin Homes** ihomes@sessions.legal 7 bshartle@sessions.legal Bryan Shartle bstangelo@sessions.legal Bradley St. Angelo 8 Gregory T. Casamento gcasamento@lockelord.com R. James DeRose, III rderose@lockelord.com 9 J. Matthew Goodin imgoodin@lockelord.com tim.filer@foster.com Tim J. Filer 10 Ryan W. Vollans rvollans@williamskastner.com 11 I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, to the best of my knowledge. 12 Dated this 11th day of June, 2021 at Seattle, Washington. 13 LEE SMART, P.S., INC. 14 By: /s Marc Rosenberg 15 Marc Rosenberg, WSBA No. 31034 Of Attorneys for Defendants 16 Patenaude & Felix, APC, and Matthew Cheung 17 1800 One Convention Place 18 701 Pike St. Seattle, WA 98101-3929 19 (206) 624-7990 mr@leesmart.com 20 21 22 23 24 25

